

**MILLER  
& MARTIN**  
PLLC  
ATTORNEYS AT LAW

1200 ONE NASHVILLE PLACE  
150 FOURTH AVENUE, NORTH  
NASHVILLE, TENNESSEE 37219-2433  
(615) 244-9270  
FAX (615) 256-8197 OR (615) 744-8466

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TRA DOCKET ROOM  
Melvin J. Malone  
Direct Dial (615) 744-8572  
mmalone@millermartin.com

May 20, 2005

**VIA HAND DELIVERY**

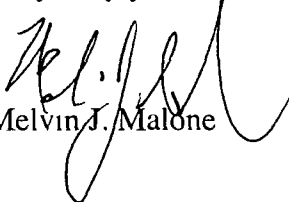
Honorable Pat Miller, Chairman  
c/o Sharla Dillon, Docket & Records Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**RE: *Petition of Frontier Communications, Inc. For a Declaratory Ruling***  
***TRA Docket No. 04-00379***

Dear Chairman Miller:

Enclosed please find one (1) original and thirteen (13) copies of Highland Telephone Cooperative, Inc.'s Petition for Leave to Intervene. We have also enclosed one copy of the documents to be file stamped for our records. Also enclosed is a check in the amount of \$25.00 for the filing fee. If you have any questions or need additional information, please let me know.

Very truly yours,

  
Melvin J. Malone

MJM cgb

Enclosures

cc: Guilford F. Thornton, Jr.  
H. LaDon Baltimore  
Fred L. Terry  
Kerry Watson  
Leslie Greer  
Greg L. Anderson

Robert Dudney  
Tom Rowland

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY,  
NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION OF FRONTIER ) DOCKET NO. 04-00379  
COMMUNICATIONS, INC. FOR A )  
DECLARATORY RULING )**

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**PETITION FOR LEAVE TO INTERVENE OF  
HIGHLAND TELEPHONE COOPERATIVE, INC.**

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Highland Telephone Cooperative, Inc. ("Highland" or "Petitioner"), by and through its undersigned counsel, hereby seeks leave to intervene in the above-captioned proceeding pursuant to Tenn. Code Ann. § 4-5-310. In support of this petition, Petitioner states as follows:

1. Petitioner is a Tennessee telephone cooperative authorized and organized under state law, specifically Tenn. Code Ann. §§ 65-29-101 *et seq.*, to operate and to provide services in the State of Tennessee and maintains its offices at 7840 Morgan County Highway (P.O. Box 119), Sunbright, Tennessee 37872-0119.

2. Petitioner provides a range of telecommunications services in its service area in the State of Tennessee.

3. In its Petition, Frontier Communications, Inc. ("Frontier") alleges that the Tennessee Regulatory Authority ("Authority" or "TRA") has granted Frontier a statewide certificate of convenience and necessity as a competing telecommunications provider and that there is no prohibition on Frontier operating within the boundaries of a Tennessee telephone cooperative

4. Further, Frontier alleges in its Petition that Ben Lomand Rural Telephone Co-op, Inc. ("Ben Lomand") has taken the position that Frontier is "statutorily prohibited" from competing in Ben Lomand's territory.

5. As Petitioner is a Tennessee telephone cooperative, the subject of this proceeding may directly affect Petitioner's operations in the State of Tennessee.

6. Petitioner's legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.

7. Because of its direct interest in this proceeding, Petitioner respectfully seeks to intervene in this matter.

8. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.

9. Should the requested intervention be granted, all notices, pleadings, orders, documents and the like in this proceeding should be provided to:

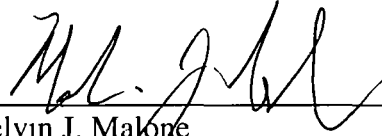
Melvin J. Malone  
 MILLER & MARTIN, PLLC  
 150 Fourth Avenue North  
 1200 One Nashville Place  
 Nashville, Tennessee 37219-2433  
 Tel (615) 244-9270  
 Fax (615) 256-8197 or (615) 744-8466  
[mmalone@millermartin.com](mailto:mmalone@millermartin.com)

and

Fred L. Terry, General Manager  
 HIGHLAND TELEPHONE COOPERATIVE, INC.  
 7840 Morgan County Highway  
 P O Box 119  
 Sunbright, Tennessee 37872-0119  
 Tel. (423) 628-2121  
 Fax (423) 628-2409  
[highland@highland.net](mailto:highland@highland.net)

Based on the foregoing considerations, Petitioner requests the Authority to grant this request for intervention

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Mel. J. Malone', is written over a horizontal line.

Melvin J. Malone  
J. Barclay Phillips  
MILLER & MARTIN, PLLC  
150 Fourth Avenue North  
1200 One Nashville Place  
Nashville, Tennessee 37219-2433  
(615) 244-9270

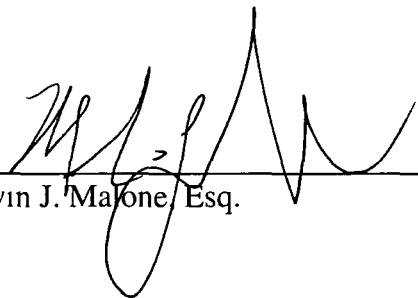
Attorneys for Highland Telephone Cooperative, Inc.

### Certificate of Service

I hereby certify that a true and correct copy has been forwarded via U.S. Mail to the following on this the 21<sup>st</sup> day of May, 2005.

Guilford F Thornton, Jr.  
Stokes Bartholomew Evans & Petree  
424 Church Street, Suite 2800  
Nashville, Tennessee 37219

H LaDon Baltimore  
Farrar & Bates, L.L.P  
211 Seventh Avenue North  
Suite 420  
Nashville, Tennessee 37219



Melvin J. Malone Esq.